



# ACTION MEMORANDUM

DATE: MAR 21 2006

SUBJECT: Request for a 12-Month Exemption and Ceiling Increase at the Kraus Enterprise Site, Buffalo, Erie County, New York

FROM: Kevin M. Matheis, On-Scene Coordinator  
Removal Action Branch

TO: George Pavlou, Director  
Emergency and Remedial Response Division

THRU: Joseph D. Rotola, Acting Chief  
Removal Action Branch

Site ID#: WL

## I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of a 12-month exemption and ceiling increase to the proposed removal action described herein for the Kraus Enterprise Site (Site), located at 20 Isabelle Street, Buffalo, Erie County, New York, 14216. On May 23, 2005, William McCabe, Acting Division Director of the Emergency & Remedial Response Division (ERRD), approved the initial request for a removal action at the Site. This Action Memorandum seeks an increase of \$852,000 to the project ceiling, of which \$661,000 is

### Kraus Enterprises CONCURRENCES

NAME: ~~XXXXXXXXXX~~ INIT: ss Date 9/6/05 Filename: AM# 265

Symbol	ERRD-RAB	ERRD-RAB	ERRD-RAB	ORC-NYSCUP	ORC-NYSCUP	ERRD-DD	ERRD-D		
Surname	Matheis	Harkay	Rotola	Capone	McCabe	Pavlou			
Date	3/6/06	3/6/06	3/7/06	3/17/06	3/14/06	Wpm	3/21/06		

for mitigation contracting. This funding increase combined with funds approved in the previous Action Memorandum for the Site will result in a total project ceiling of \$1,557,000, of which \$1,306,000 is for mitigation contracting.

The Site is not on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with the proposed removal action.

## **II. SITE CONDITIONS AND BACKGROUND**

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Information System ID Number for the Site is NY0000201939.

### **A. Site Description**

#### **1. Removal site evaluation (RSE)**

On December 22, 2004, the New York State Department of Environmental Conservation (NYSDEC) requested that EPA evaluate the Kraus Enterprise Site for a Superfund removal action. In the referral request, the NYSDEC informed the U.S. Environmental Protection Agency (EPA) that the vacated Kraus Enterprise warehouse contained an estimated 1,000 or more abandoned containers of paints, solvents, petroleum and unknown materials, which were observed in varying sizes (pints, 1-5-30-55 gallon cans/drums) and stages of deterioration. As discussed below, this referral was based on a joint inspection conducted by the NYSDEC and EPA. The initial Action Memorandum for the Site, which was approved on May 23, 2005, is included as Attachment 1.

During the course of the cleanup at the Site, EPA has identified over 5,000 containers of hazardous substances within the Site buildings, roughly five times the preliminary estimate. In addition, EPA has determined that seven times the initial estimate of asbestos piping is present at the Site. The purpose of this ceiling increase is to request additional funding to address the increased amount of hazardous substances found at the Site and to initiate the necessary asbestos abatement activities.

The cleanup is expected to extend past the 12-month exemption date of May 23, 2006 due to the scope of cleanup being greater than originally anticipated. Work is expected to be completed in late 2006.

#### **2. Physical location**

The Site is located in a mixed commercial and residential area in the **Riverside** section of the City of Buffalo, Erie County, New York. Isabelle Street runs along the northwest edge of the Site and Crowley Avenue borders the southwest edge of the Site. Bordering the Site along the

eastern edge is a commercial rail-line. The Site is one block east/southeast of Ontario Avenue, a main commercial street within the Riverside section of Buffalo. Both Isabelle and Crowley contain residential properties directly across from the Site. There are approximately 7,399 persons comprising 3,353 households within a ½ mile radius of the Site. Approximately 30% of those persons are aged 17 or younger and 14% are aged 60 and older.

The Site property is approximately two acres in size, most of which is covered by a series of interconnected warehouse buildings. Kraus Enterprise formerly utilized a portion of the warehouse space and the balance of the warehouse was formerly used by tenants for various manufacturing operations and warehouse storage.

### 3. Site characteristics

EPA's Enforcement Team is investigating Site operational history and former occupants and operators of the buildings. Historical Sanbom maps have indicated that the Site buildings were constructed in 1910 and operated initially by the King Sewing Machine Company. Another Sanbom map from the 1960's indicates that Sylvania Electric Products operated at the facility. Information provided by the City of Buffalo indicates that Kraus Enterprise has been operating at the Site since at least 1965.

This is a request for a 12-month exemption and a ceiling increase Action Memorandum for the Site.

### 4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The hazardous substances identified by EPA from container labeling as part of the RSE and information obtained during the Site inspections includes the following hazardous substances, as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, 42 U.S.C. Section 9601 et seq.

Material	Quantity	Storage Method	Primary Hazard	Statutory Source for Designation as a Hazardous Substance
PCB ballasts and transformers	Over 1,000 ballasts and five transformers	Transformers and light ballasts	Carcinogen	3

Asbestos	~7,000 linear feet and 100 cubic yards of debris	None. Hanging from piping and scattered throughout the building in debris piles	Carcinogen	1, 2
Flammable Liquids - Paints and solvents, propane cylinders	~2,000 containers	1 pint - 5 gallon pails	Flammable (D001)	3
Corrosive Detergents and Cleaners	~500 containers.	1 pint - 5 gallon pails	Corrosive (D002)	3

Notes: 1 - Clean Water Act (CWA) Section 307(a)  
2 - Clean Air Act (CAA) Section 112  
3 - Resource Conservation and Recovery Act (RCRA) Section 3001

The suspected asbestos containing material (ACM) in the building is in poor condition and much of it has fallen onto the floors. Some of the ACM has been swept into large debris piles and abandoned. Asbestos is designated as a CERCLA hazardous substance under 40 CFR §302.4 when it is friable. Friability is the ease with which a material can be crumbled, pulverized or reduced to powder, when dry, by hand pressure. The more easily that a material crumbles, the greater the potential for fiber release. Once released, asbestos fibers have the ability to remain airborne for an extended period of time. Much of the ACM in the buildings on-Site is extremely friable due to its exposure to the elements as a result of the partially collapsed roof, damaged walls and broken windows.

The building's partially collapsed roof and broken windows represent mechanisms for release of asbestos fibers into the environment. When ACM is exposed to the elements, the potential for the off-Site migration of asbestos fibers is significantly increased. The potential for future releases can only be exacerbated by further deterioration of the buildings and/or release from the Site by the threat of fire and/or explosion. EPA has confirmed the presence of asbestos within the Site buildings. An asbestos survey of the Site is included at Attachment 2. EPA will remove the ACM on a case-by-case basis, depending on the condition of it. EPA will only remove ACM that exhibits active releases, such as damaged areas and areas where the asbestos has fallen to the ground. If conditions warrant, asbestos piping that is in good condition will be left in place and an encapsulate will be used to prevent the release of fibers.

The small containers of paint-related materials and corrosive cleaners were scattered throughout the facility and now are in a central storage location. These containers are being packed for disposal.

Approximately 400 compressed gas cylinders were present throughout the Site and have been placed into a central storage area. Hundreds of mercury-containing fluorescent and metal-halide bulbs were stockpiled, with some having been vandalized and broken. Most of these light bulbs have been removed from the buildings and are being stored prior to disposal. Several rooms within the Site buildings require additional cleaning to remove the broken light bulb fragments. Accessing some of the aforementioned waste materials was made difficult due to building flooding (from three water main breaks) and the excessive amount of abandoned solid waste.

Six large 200-gallon capacity transformers found on-Site contain polychlorinated biphenyls (PCBs) at concentrations greater than 200 parts per million (ppm). The transformers have oil stains on them indicating that their contents have leaked. Prior to EPA actions, it appears that wiring has been stripped from the transformers by vandals seeking scrap metal. If EPA does not remove the transformers from the Site, vandals may spill the oil out of the transformers to access the copper scrap located within. In addition, an estimated 3,000 PCB light ballasts are within the Site buildings. Many of the light fixtures are in poor condition and some of the ballasts have begun to deteriorate. Removal of the ballasts will prevent further release of PCBs. Thus far, EPA has collected 665 of the PCB light ballasts. Sample results from the transformer and ballast sampling are found in Attachment 3.

In addition to the smaller containers, approximately 75, 55-gallon drums were observed to be abandoned on-Site. These drums have been placed into a central storage location and are in the process of being analyzed for disposal. Included as Attachment 4 is the complete inventory of containers collected from the Site buildings and currently being stored together pending disposal.

This ceiling increase removal action addresses the disposal of these hazardous materials from the Site.

#### 5. NPL status

The Site is not listed on the NPL and there are no efforts underway to include the Site on the NPL.

#### 6. Maps, pictures, and other graphic representations

Figures 1, 2, and 3 are included as Attachment 5 and provide the location and configuration of the Site.

**B. Other Actions to Date**

**1. Previous actions**

In December 2003, EPA implemented a removal action at the Aryl Site. The Aryl Site comprised a portion of the Kraus Enterprise warehouse at which Aryl Corp. was a tenant of Kraus Enterprise. At the time, other portions of the Kraus Enterprise property were occupied by active businesses.

In July and August 2004, the City of Buffalo Housing Court ordered all remaining tenants of the building to vacate the property due to the poor condition of the building. A joint inspection in December 2004 by NYSDEC and EPA of the Aryl Site resulted in the current removal action.

The City of Buffalo has taken steps to secure the Site buildings after the December 2004 fires at the Site, as described in the initial Action Memorandum for the Site. See Attachment 1.

**2. Current actions**

EPA began removal actions at the Site on June 10, 2005. EPA actions to date at the Site include the following:

- Removed of approximately 500 tons of debris commingled with waste from outside the buildings at the Site;
- Completed assessment of over 500,000 square foot warehouse, with waste being brought into central storage location for forthcoming disposal;
- Collected over 5,000 containers of waste ranging in size from one pint to 55-gallon drums from throughout the warehouse;
- Fenced, secured and lighted property to secure from trespassing;
- Packed 5,000 containers into Department of Transportation shippable containers, pending disposal;
- Removed 25% of the Site PCB ballasts from dilapidated light fixtures (a total of 665);
- Assessed and sampled six large PCB transformers;
- Removed 120,000 gallons of waste water from Site basements and discharged waste in accordance with Buffalo Sewer Authority permit; and
- Assessed remaining asbestos at Site by measuring linear feet, sampling and providing cost estimates for abatement.

**C. State and Local Authorities' Role**

**1. State and local actions to date**

No City of Buffalo or NYSDEC cleanup actions have occurred to date at the Site.

2. Potential for continued State/local response

There are no actions being taken by State or local government agencies to address the hazardous substances located at the Site.

**III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES**

**A. Threats to Public Health or Welfare**

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;

There has been and continues to be a release and potential release of CERCLA-designated hazardous substances from the Site, a facility under Section 101(9) of CERCLA. As a result, there is a potential exposure to hazardous substances by nearby populations.

Six 200-gallon capacity transformers found on-Site contain PCBs. The transformers have oil stains on them indicating that their contents have leaked. Prior to EPA actions, wiring was stripped from the transformers by vandals seeking scrap metal. If EPA does not remove the transformers from the Site, vandals may spill the oil out of the transformers to access the copper scrap located within.

An estimated 3,000 PCB light ballasts are within the Site buildings. Many of the light fixtures are in poor condition and some of the ballasts have begun to deteriorate. Removal of the ballasts will prevent further release of PCBs from the light ballasts.

A total of 170, 55-gallon drums and cubic yard disposal boxes are on-Site. The 5,000 containers have been sorted by compatibility and consolidated into these drums and boxes. The drums and boxes require off-Site disposal since they are not suitable for long-term storage and a release could occur.

In addition, asbestos-containing materials and asbestos insulation have been observed on 7,000 linear feet of piping and on the floor. Although the Site is temporarily secured, it has been the subject of frequent break-ins and vandalism. Releases from asbestos, drums and laboratory containers have occurred and present a threat to public health and welfare.

- (iii) **Hazardous substances, or pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

A total of 170, 55-gallon dmms and cubic yard disposal boxes are on-Site. The 5,000 containers have been sorted by compatibility and consolidated into these dmms and boxes. These dmms and boxes require off-Site disposal since they are not suitable for long-term storage and their contents could be released into the environment.

The Buffalo Fire Department responded to two fires in December 2004 at the warehouse involving debris mixed with hazardous substances.

- (v) **Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released;**

Some of the roofs in the Site buildings are in poor condition. The City of Buffalo ordered tenants to vacate the buildings due to unsafe conditions at the Site. Snow melt and rainfall contribute to the decay of the building structure and may cause additional parts of the roof to collapse, causing further deterioration to the asbestos and containers of hazardous substances. Containers of hazardous substances will be exposed to a freeze/thaw cycle since the Site has no utilities. Oil from PCB transformers, PCB ballasts, dmms generated from the cleanup and asbestos must be removed, otherwise further releases may occur.

- (vi) **Threat of fire or explosion; and**

The consolidation of the 5,000 containers has resulted in the generation of thirty drums of flammable material which present a threat of fire and/or explosion. In addition to airborne releases of hazardous substances in the event of a fire, asbestos fibers would also be released from the Site.

- (vii) **The availability of other appropriate federal or State response mechanisms to respond to the release.**

No other federal or State response mechanism is available to respond to the significant threat which the Site presents.

#### **B. Threats to the Environment**

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants; and

There has been and continues to be a release and potential release of CERCLA-designated hazardous substances from the Site. As a result, there is potential exposure to hazardous substances by environmental media and receptors.

Six large 200-gallon capacity transformers found on-Site contain PCBs. The transformers have oil stains on them indicating that their contents have leaked in the past. Prior to EPA actions, wiring has been stripped from the transformers by vandals seeking scrap metal. If EPA does not remove the transformers from the Site, vandals may spill the oil out of the transformers to access the copper scrap located within.

An estimated 3,000 PCB light ballasts are within the Site buildings. Many of the light fixtures are in poor condition and some of the ballasts have begun to deteriorate. Removal of the ballasts will prevent further release of PCBs from the light ballasts.

A total of 170, 55-gallon drums and cubic yard disposal boxes are on-Site. These drums and boxes are the result of the consolidation of 5,000 containers of chemicals from throughout the Site buildings. These drums and boxes require off-Site disposal since they are not suitable long-term storage containers and could be released into the environment.

In addition, asbestos-containing materials and asbestos insulation were observed on 7,000 linear feet of piping and on the floor. Although the Site is temporarily secured, it has been the subject of frequent break-ins and vandalism. Releases from asbestos, drums and laboratory containers have occurred and may present a threat to the environment.

- (v) Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released.

Some of the roofs in the Site buildings are in poor condition. The City of Buffalo ordered tenants to vacate the building due to unsafe conditions at the Site. Snow melt and rainfall contribute to the decay of the building structure and may cause additional parts of the roof to collapse, causing further deterioration to the asbestos and containers of hazardous substances. Containers of hazardous substances will be exposed to a freeze/thaw cycle since the Site has no utilities. Oil from PCB transformers, PCB ballasts, drums generated from the cleanup and asbestos must be removed, otherwise further releases to the environment may occur.

#### IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances at or from the Site, if not addressed by implementing the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, or welfare, or environment.

#### V. EXEMPTION FROM STATUTORY LIMITS

##### A. Emergency Exemption

1. There is an immediate risk to public health, or welfare, or the environment

The Site contains drums, cylinders, PCB-containing electrical equipment, and friable asbestos in poor condition. The Site is located in a mixed residential and commercial neighborhood. The presence of hazardous substances at the Site, along with the history of arson and break-in attempts and the close proximity of residential dwellings, presents an immediate risk to public health, or welfare, or the environment.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency

Most of the containers of hazardous substances have been collected and repackaged for disposal. Additional work is needed to remove these containers from the property. In addition, PCB-containing electrical equipment continues to require disposal, along with friable asbestos abatement in areas where asbestos is in poor condition. These response actions are needed immediately to prevent, limit, or mitigate an emergency.

3. Assistance will not otherwise be provided on a timely basis

No other governmental or potentially responsible party (PRP) can provide assistance to mitigate the public health threats on a timely basis at the Site.

#### VI. PROPOSED ACTION DESCRIPTION AND ESTIMATED COSTS

##### A. Proposed Actions

1. Disposal - All waste generated from site operations will be containerized and prepared for off-Site shipments. Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-Site disposal facilities in compliance with EPA's Off-Site Disposal Rule.
2. Asbestos Abatement - EPA will only remove asbestos that exhibits active releases, such as damaged areas and areas where the asbestos has fallen to the ground. Other areas of asbestos will be encapsulated and left in place.

3. PCB Transformer and Ballast Removal - Transformers and ballasts will be removed into secure location and disposed in accordance with EPA's Off-Site Disposal Policy.
4. Other Areas of Concern - Which include asbestos debris piles and pits and sumps in the floors, will be evaluated and addressed, as necessary.

**B. Contribution to remedial performance**

The Site is not presently on the NPL. The response measures proposed in this Action Memorandum will address the threats posed to public health through removal of hazardous substances. The proposed action will contribute effectively to any long-term remedial action with respect to the release or threatened release of hazardous substances at the Site.

**C. Description of alternative technologies**

Because of the quantities and types of the hazardous substances and/or wastes at the Site, on-site treatment and/or incineration is not appropriate. The selected removal action includes the characterization of hazardous substances found at the Site and the transportation of all hazardous substances off-Site for treatment and/or disposal. The selected removal action has been determined to be the appropriate response action for the Site based upon the criteria of effectiveness, implementability and cost.

**D. EE/CA (Engineering Evaluation/Cost Analysis)**

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

**E. Applicable or Relevant and Appropriate Requirements (ARARs)**

ARARs that are within the scope of this removal action will be met to the extent practicable. Federal ARARs determined to be applicable for the proposed scope of work include the Resource Conservation and Recovery Act, the Occupational Safety and Health Act and the Hazardous Materials Transportation Uniform Safety Act.

**F. Project schedule**

It is anticipated that the project will be completed within four months. Four phases will be implemented, each taking different time-frames to complete. Phase one will be shipment of waste from the Site. Phase two will be the PCB transformer and ballast removal. Phase three will be the partial asbestos abatement. Phase four will be the Site demobilization.

## G. Estimated Costs:

The estimated costs for the completion of this project are summarized below. Detailed costs are included as Attachment 6.

### Extramural Costs:

	<u>Current Ceiling</u>	<u>Additional Funding Requested</u>	<u>Proposed Ceiling</u>
<u>Regional Allowance Costs:</u>			
ERRS Cost	\$ 481,000	\$ 575,000	\$ 1,056,000
Contingency	\$ 164,000*	\$ 86,000	\$ 250,000
Total ERRS Cost	\$ 645,000*	\$ 661,000	\$ 1,306,000

### Other Extramural Costs Not Funded From the Regional Allowance:

Total RST costs	\$ 60,000	\$ 80,000	\$ 140,000
<b>SUBTOTAL, EXTRAMURAL COSTS</b>	<b>\$ 613,000</b>	<b>\$ 741,000</b>	<b>\$ 1,354,000</b>
Extramural Cost Contingency (15%)	\$ (92,000)*	\$ 111,000	\$ 111,000

### **TOTAL, REMOVAL PROJECT CEILING**

\$ 705,000	\$ 852,000	\$ 1,557,000
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\* These costs include the transfer of Extramural Contingency into mitigation contracting. The transfer of \$92,000 which was from Extramural Contingency included in the previous Action Memorandum resulted in a new Mitigation Contracting ceiling of \$1,306,000.

## **VII. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED**

Should no action be taken or the planned action be delayed, hazardous substances such as asbestos in Site buildings and hazardous substances contained in drums, maintenance chemicals, light bulbs and cylinders, could be released. A release of hazardous substances from the Site could result in the exposure of the neighboring population and/or contamination of the environment. Releases of contaminants to the air and additional soil contamination could increase the cost of the required removal action.

## **VIII. OUTSTANDING POLICY ISSUES**

No known outstanding policy issues are associated with the Site.

## IX. ENFORCEMENT

At present, there are no known, viable PRPs. Mr. Kraus, who has filed personal bankruptcy, is impecunious. The value of the Site property is minimal. EPA believes that various tenants have abandoned chemicals at the Site. EPA has obtained information on which units each tenant occupied at the Site. During the removal action, EPA has inventoried and documented materials on-Site. If practicable, for any viable PRPs whose materials are identified, EPA will seek their participation in the off-Site disposal phase of this action. If any such party declines to participate, cost recovery may be sought.

### Enforcement Cost Estimate

Based on full cost accounting practices, the total EPA costs for this removal action that will be eligible for cost recovery are estimated to be \$2,159,000, as follows:

#### EPA's Total Estimated Project-Related Costs

$\$1,557,000$  (direct extramural costs) +  $\$100,000$  (direct intramural costs) =  $\$1,657,000$ .

$30.30\%$  (Region-specific indirect Cost Rate) x  $\$1,657,000$  =  $\$502,000$  (rounded indirect costs)

$\$1,657,000 + \$502,000 = \$2,159,000$  (Estimated EPA Costs for Removal Action)

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of Site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

## X. RECOMMENDATION

This decision document represents the selected removal action for the Kraus Enterprise Site in the City of Buffalo, New York, developed in accordance with CERCLA, as amended, and is consistent with the NCP. This decision is based on the Administrative Record for the Site. Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed 12-month exemption and ceiling increase removal action. Approval of this Action Memorandum will result in an increase of \$852,000 to the project ceiling, of which \$661,000 is for mitigation contracting. This finding increase combined with funds approved in the previous Action Memorandum will result in a total project ceiling of \$1,557,000, of which \$1,306,000 is for mitigation contracting. Of this, an estimated amount of

\$661,000 will come from the FY-06 Regional Advice of Allowance for mitigation contracting.

Please indicate your approval, or disapproval, and authorization of funding as per current Delegation of Authority, by signing below.

APPROVAL: \_\_\_\_\_

George Pavlou, Director  
Emergency and Remedial Response Division

DATE: \_\_\_\_\_

DISAPPROVAL: \_\_\_\_\_

George Pavlou, Director  
Emergency and Remedial Response Division

DATE: \_\_\_\_\_

cc: (after approval)  
G. Pavlou, ERRD-D  
W. McCabe, ERRD-DD  
J. Rotola, ERRD-RAB  
D. Harkay, ERRD-RAB  
G. Zachos, ACSM/O  
J. LaPadula, ERRD-NYRB  
T. Lieber, ORC-NYCSFB  
P. Brandt, PAD  
R. Manna, OPM-FMB  
T. Rivero, OPM-GCMB  
T. Grier, 5202G  
P. McKechnie, OIG  
A. Enghsh, NYSDEC  
D. Farrar, NYSDEC  
P. Miller, NYSDEC  
A. Raddant, USDOJ  
J. Steger, NOAA  
L. Battes, NYSEMO  
G. Litwin, NYSDOH  
C. Kelley, RST

# **Attachment 1**

*NYSDEC Referral*

**New York State Department of Environmental Conservation  
Division of Environmental Remediation, 12<sup>th</sup> Floor**

625 Broadway, Albany, New York 12233-7020

Phone: (518) 402-9543 • FAX: (518) 402-9595

Website: [www.dec.state.ny.us](http://www.dec.state.ny.us)



Erin M. Crotty  
Commissioner

December 22, 2004

Mr. George Pavlou  
Director  
Emergency & Remedial Response Division  
USEPA, Region II  
290 Broadway  
New York, New York 10007-1866

RE: Kraus Enterprises Warehouse  
254 Rano Street/ 21 Isabelle Street  
Buffalo (C), Erie County

Dear Mr. Pavlou:

The New York State Department of Environmental Conservation (NYSDEC) hereby requests that the United States Environmental Protection Agency (USEPA) perform an appropriate CERCLA emergency response action at the Kraus Enterprises warehouse at 254 Rano Street and 21 Isabelle Street in Buffalo, New York.

Kraus Enterprises is the owner of record at the warehouse complex at the above-noted address. During a USEPA Removal Action undertaken at the Aryl Site (Site #UU, one of Kraus's tenants in the facility), the owner submitted a letter dated April 16, 2004, which informed tenants that he was abandoning the property. A written request was made by the NYSDEC on May 18, 2004, to the USEPA to investigate residual wastes not originally part of the removal work they had completed.

In response to NYSDEC's request, the USEPA began preparation of a scope of additional work to investigate subsurface conditions proximal to the Aryl tenancy. A site visit was held with NYSDEC personnel and Kevin Matheis (USEPA), at the Aryl site on December 14, 2004. When entering the site, it was observed that the City of Buffalo issued postings informing tenants to vacate the premises. The site is currently vacant, except for a live transformer and switch area supplying power to additional, adjacent buildings apparently not part of Kraus's property. The facility is extensively deteriorated with weakened walls, roof leaks, asbestos-containing material (ACM), and a notable lack of security.

Inside of the vacated Kraus warehouse an estimated 1000+ abandoned containers of paints, solvents, petroleum, and unknown materials were observed in varying sizes (pints, 1-5-30-55 gallon cans/drums) and states of distress. Many containers indicated contents that were corrosive, flammable or toxic. Some spilled materials were observed in several areas of the warehouse, including a large waste pile that had recently been set on fire. A number of compressed gas cylinders were present throughout the site. Hundreds of mercury-containing fluorescent and metal-halide bulbs were stockpiled, with a large number that had been broken. Excessive amounts of abandoned solid waste presents difficulty in accessing some of the aforementioned waste materials.

Additional USEPA emergency response action is requested to identify and dispose of hazardous wastes and to determine what, if any, impacts to soil and groundwater have occurred as a result of spillage.

If you have any questions regarding this request, please contact Mr. Martin Doster, in our Region 9 office in Buffalo, at (716) 851-7220.

Sincerely,

*Andrew J. English*

Andrew J. English, P.E.  
Acting Director  
Bureau of Technical Support

cc: B. Sprague - USEPA, Region II, Edison, NJ  
G. Zachos - USEPA, Region II, Edison, NJ  
R. Salkie - USEPA, Region II, Edison, NJ

# Attachment 2

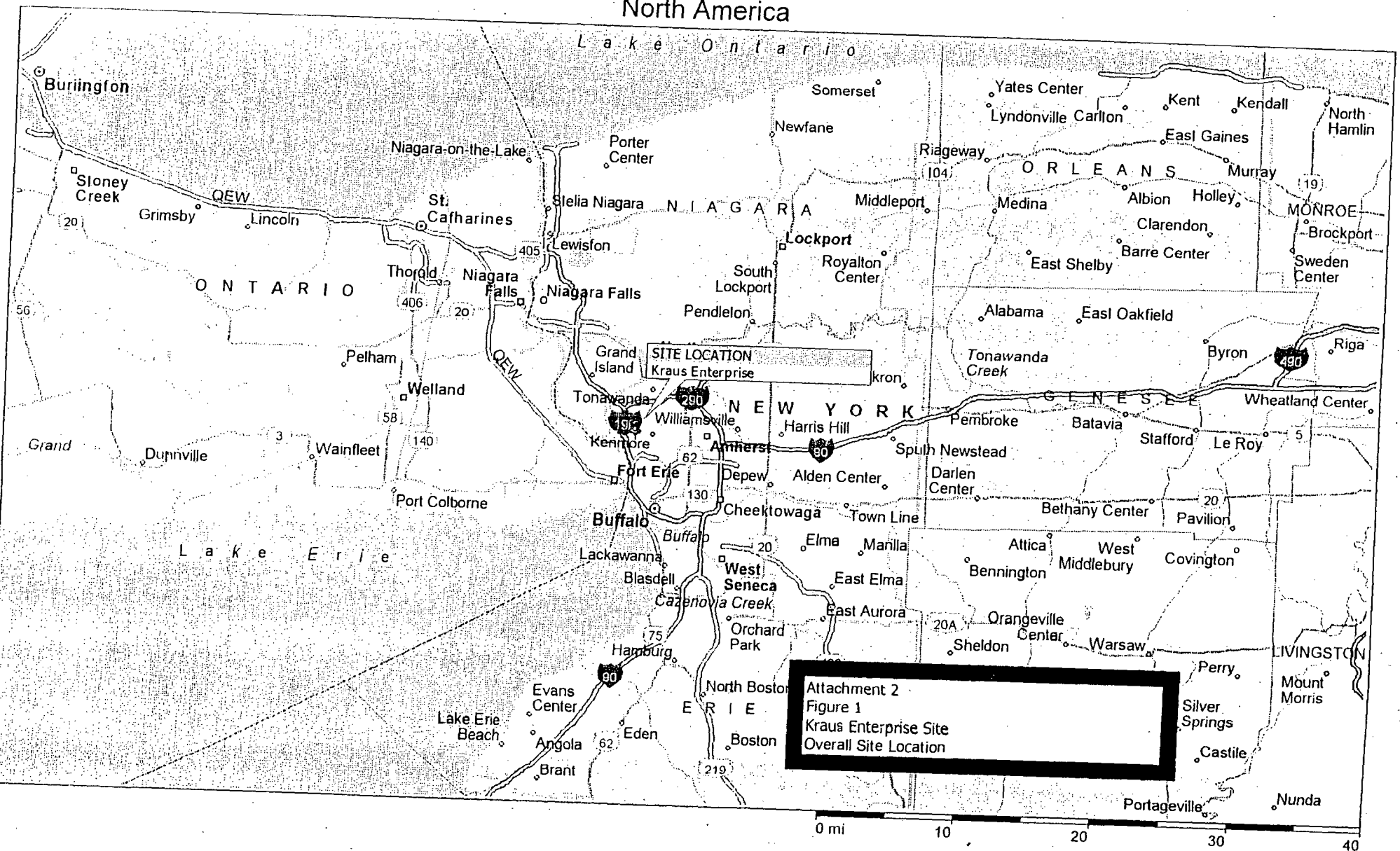
## *Maps and Photos*

*Figure 1 - Site Location*

*Figure 2 - Site Location*

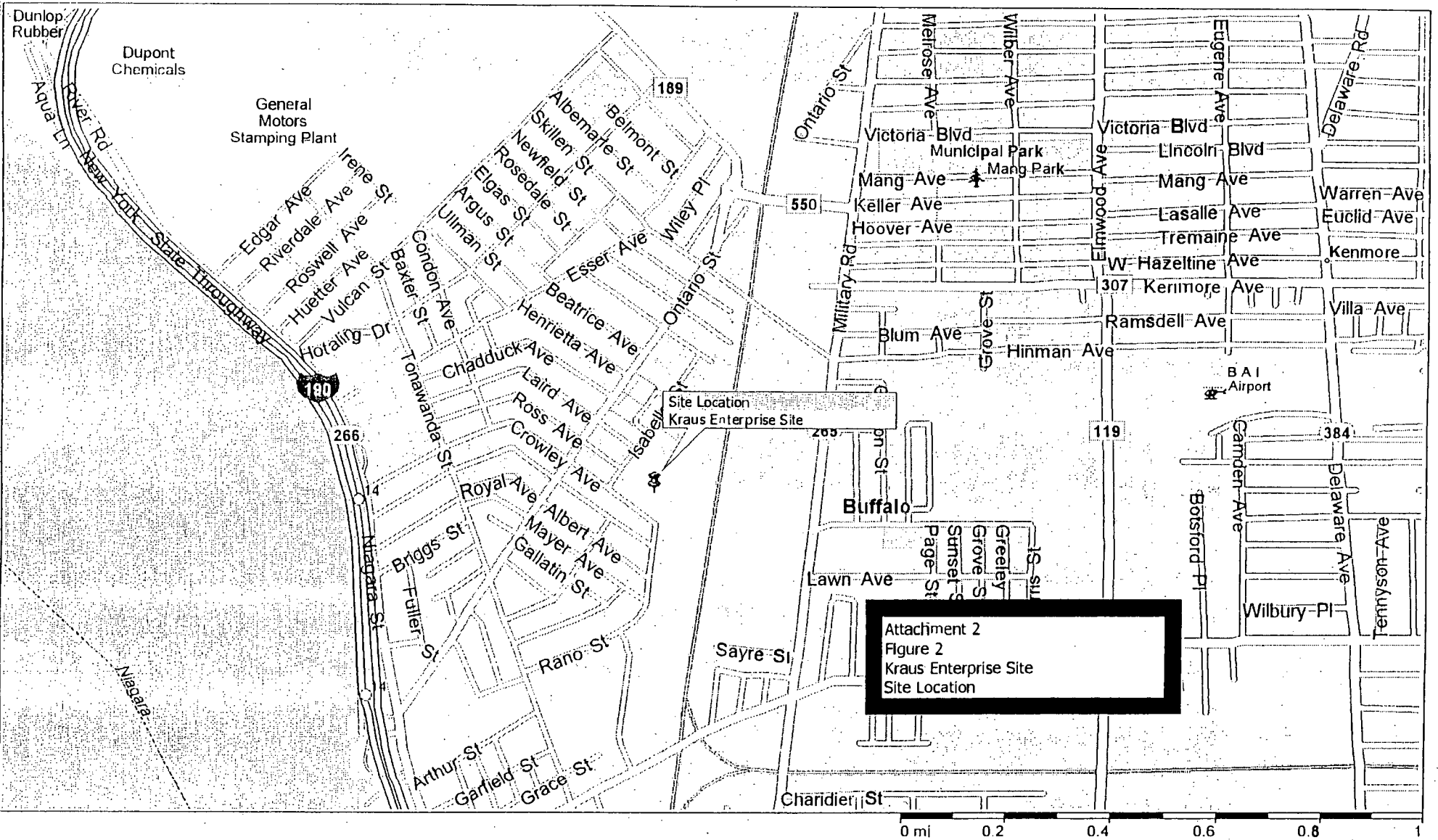
*Figure 3 - Site Aerial Photo*

# North America




Attachment 2  
Figure 1  
Kraus Enterprise Site  
Overall Site Location

# Buffalo, New York, United States



Attachment 2  
Figure 2  
Kraus Enterprise Site  
Site Location

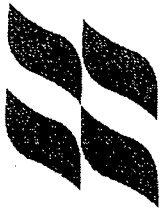


<< ----- Site Location

Attachment 3  
Figure 3  
Kraus Enterprise Site  
Aerial Photograph of Site Buildings

## **Attachment 2**

### *Asbestos Survey*



**OP-TECH**  
ENVIRONMENTAL SERVICES, INC.

December 8<sup>th</sup> 2005

Mr. Scott Soden  
WRS Infrastructure & Environmental, Inc.  
221 Hobbs Street, Suite 108  
Tampa, FL 33619

RE: SUMMARY OF SAMPLE COLLECTION FOR ASBESTOS AT THE  
US EPA KRAUS ENTERPRISE SITE, 21 ISABELLE ST. BUFFALO, NY.

On November 3, 2005 a sampling event was held at the above captioned site. The samples were taken to determine the potential presence of asbestos containing materials (ACM's). The samples were taken only for this purpose. This was in conjunction with the measurement of potentially asbestos containing materials (PACM's). This was not a complete asbestos survey, simply a measurement and sampling event. The materials were measured in all accessible areas; some areas were not accessible due to a variety of reasons. The final measurement revealed approximately 9050 linear feet of PACM. This is thermal insulation only and does not include the following: Floor tile, any boilers, any materials located in the flooded basement, and/or any materials not seen.

Samples were collected in the following locations:

**Building No. 10**

These thermal pre-form pipe insulation samples were taken from the pre-formed insulation material that was located up in a loft area of Building No. 10. The material was still in what appeared to be the original manufacturer's boxes.

ID 11305WRS01A  
ID 11305WRS01B  
ID 11305WRS01C

**Building No. 3**

This sample was taken of thermal pipe insulation commonly known as air cell. Air cell is a corrugated material similar to cardboard. This material comes in sections three feet long and is wrapped around the pipe and held together with steel bands and located on various pipes throughout the building.

ID 11305WRS02A  
ID 11305WRS02B  
ID 11305WRS02C

Building No. 2

This sample was taken of thermal pipe insulation commonly known as magnesium, this material is a pre-formed to pipe in two halves and held together with bands or a cloth material and located on various pipes throughout the building.

ID 11305WRS03A

ID 11305WRS03B

ID 11305WRS03C

Measured PACM:

Op-Tech Environmental Services, Inc. (Op-Tech) was requested to quantify the assumed friable asbestos containing material located at the above address. On November 1st & 3<sup>rd</sup> 2005 Op-Tech visited the site and conducted an inventory of the suspected friable asbestos containing material. The following quantities listed are estimated. The basement was inaccessible do to high water. From a partial observation of the basement from a stairwell, pipe insulation was observed.

Room Number or description	Description of Material	Estimated Quantity	Unit of Measure
1 <sup>st</sup> floor weather damaged area Room # 1	Air cell / Mag. mix	98	Linear Feet
1 <sup>st</sup> floor weather damaged area Room #2	Air cell / Mag. Mix	69	Linear Feet
2 <sup>nd</sup> floor bad weather area Room #1	Air cell / Mag. Mix	95	Linear Feet
2 <sup>nd</sup> floor bad weather area Room #2	Air cell / Mag. Mix	132	Linear Feet
Tower	Air cell / Mag. Mix	210	Linear Feet
Roof / Overhead Alley	Air cell / Mag. Mix	181	Linear Feet
1 <sup>st</sup> floor Room #2	Air cell / Mag. Mix	2,814	Linear Feet
1 <sup>st</sup> floor Room #9	Air cell / Mag Mix	90	Linear Feet
Ist floor Room #10	Air cell / Mag Mix	2,276	Linear Feet
2 <sup>nd</sup> floor Room #10 loft	Air cell / Mag Mix	30	Linear Feet
1 <sup>st</sup> floor Room #13	Air cell / Mag Mix	1,200	Linear Feet
2 <sup>nd</sup> floor Room #16	Air cell / Mag Mix	25	Linear Feet
1 <sup>st</sup> floor Room #17	Air cell / Mag Mix	1,590	Linear Feet
2 <sup>nd</sup> floor Rooms #13 & #17 Duct Area	Air cell / Mag Mix	240	Linear Feet
Total		9,050	Linear Feet

Appendix:

- A – Sample location drawing
- B – Chain of custody and analysis results
- C – Lab certifications

Report completed by:

Kevin P. Cannon  
Op-Tech Environmental Service Inc.  
256 Sawyer Ave.  
Tonawanda, NY. 14150

Ph. 716-873-7680  
Fax 716-873-7807

## Appendix – A

ISABELLE

CROWLEY

KRAUS ENTERPRISES  
W.HOS. & INDUSTRIAL CENTER

ENCLOSED BY T  
NUMEROUS ROSE TANKS  
AND RADIO SYSTEM

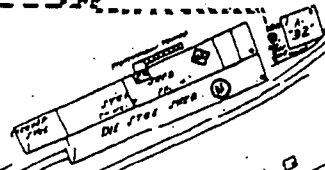
STEEL FR. CONC. PL. 10  
WOOD PL. 100  
LOFT BLDGS

STEEL FR. CONC. PL. 10  
WOOD PL. 100  
LOFT BLDGS

WHOL. GRO.

TRAIN SPEED

FACTORY BLDG.



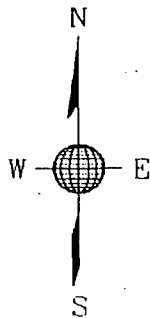
SCALE OF FEET  
COPYRIGHT LANDRE MAP COMPANY, INC.

414

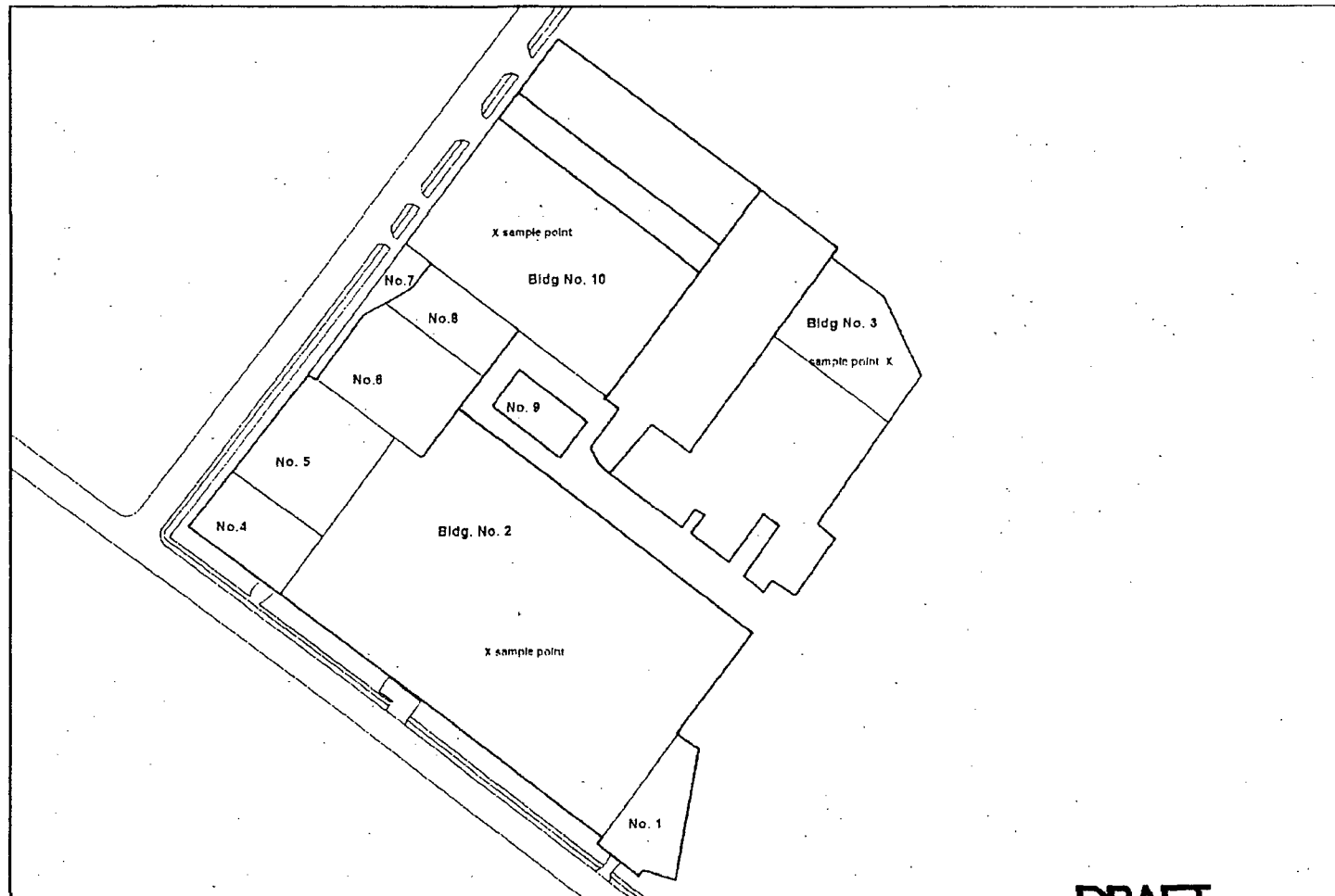
428

375

27



0 100 150 200  
APPROXIMATE SCALE: 1"=100'



**DRAFT**

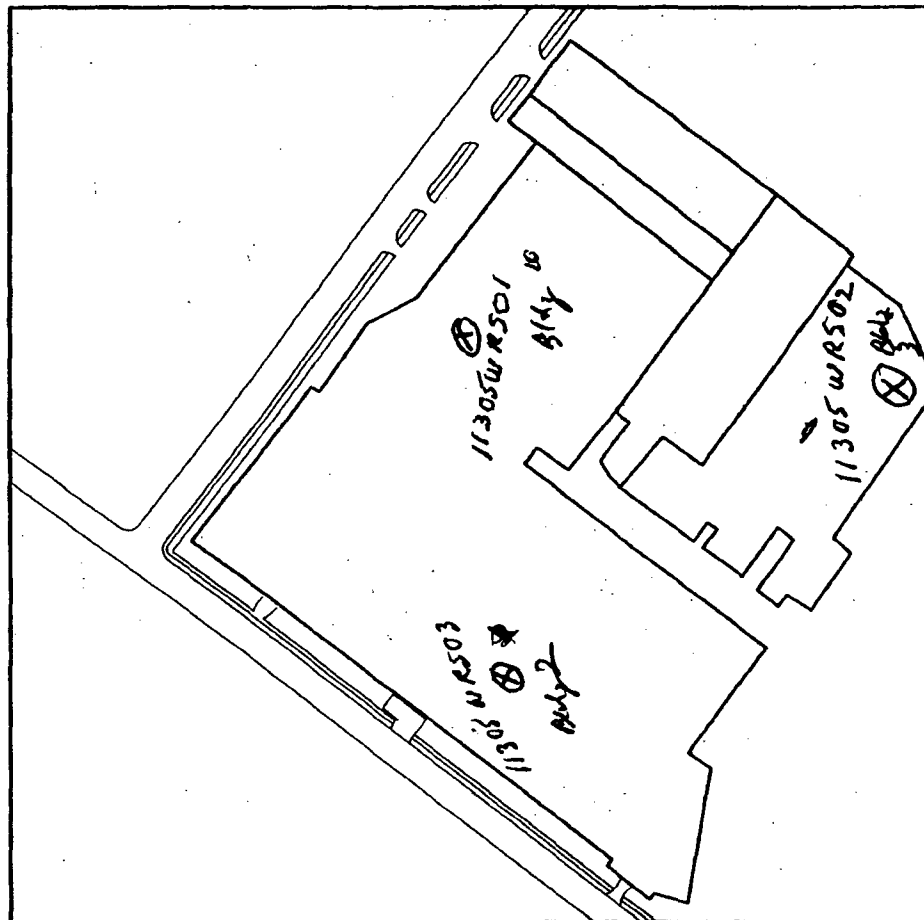
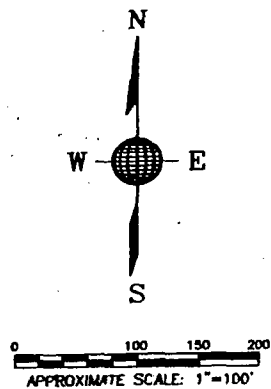
DRAWING STATUS	DRAFT <input checked="" type="checkbox"/> FINAL
PROJECT NO. :	525C22
PROJECT MANAGER:	SCOTT SODON
SCALE:	1"=100'
REVISION NO. :	0
CADD ID:	525022A001
ORIN BY:	D.K.M.
CHK BY:	S.S.
APPVD BY:	S.S.
REV DATE:	
PLOT DATE:	05/14/05
ORIN DATE:	05/14/05
CHK DATE:	05/14/05
APPVD DATE:	05/14/05



**WRS Infrastructure & Environment, Inc.**

221 HOBBS STREET, SUITE 108, TAMPA, FLORIDA 33619  
PH. (813) 684-4400 FAX. (813) 684-9177

FIGURE 1  
SITE MAP  
KRAUS WAREHOUSE  
ADDRESS



**DRAFT**

DRAWING STATUS: DRAFT <input checked="" type="checkbox"/> FINAL	
PROJECT NO.: 325022	
PROJECT MANAGER: SCOTT SODON	
SCALE: 1"=100'	
REVISION NO.: 0	REV DATE:
CADD ID: S25022001	PLOT DATE: 05/14/23
DRN BY: D.K.M.	DRN DATE: 05/14/23
CHK BY: S.S.	CHK DATE: 05/14/23
APP'D BY: S.S.	APP'D DATE: 05/14/23



**WRS Infrastructure &  
Environment, Inc.**

221 HOBBS STREET, SUITE 108, TAMPA, FLORIDA 33619  
PH: (813) 684-4400 FAX: (813) 684-9177

**FIGURE 1  
SITE MAP  
KRAUS WAREHOUSE  
ADDRESS**

## Appendix – B

140504795



# EMSL Analytical Inc. 490 Rowley Rd. Depew, NY 14043

Phone: 716-651-0030 Fax: 716-651-0394 Pager: 800-206-9523

Company: WRS Infrastructure & Environment	Site Address: 21 Isabelle Street	TAT	6-10 Day
Street: 221 Hobbs Street	Work Area: Buffalo, NY 14207	<input checked="" type="checkbox"/> PLM	TEM Other
City/St/Zip Tampa, FL 33619	Project Name: Krauss Warehouse Site	Sample Date	11/03/05
CONTACT: Daren Wood	Special Instructions: Email to <a href="mailto:dwood@wrsie.com">dwood@wrsie.com</a>	Phase of work	Background Prep
Phone: 716-447-1786 Fax: 716-447-1781	Weather Conditions:		During Finals
Cell: 404-499-4067	PO:		

Sample Number		Sample Location	Flow L/min On	Flow L/min Off	Flow L/min Average	Time On	Time Off	Total Minutes	Volume Liters
11305WRS01A	IWA OWA	Bldg 10							
11305WRS01B	IWA OWA	Bldg 10							
11305WRS01C	IWA OWA	Bldg 10							
11305WRS02A	IWA OWA	Bldg 3							
11305WRS02B	IWA OWA	Bldg 3							
11305WRS02C	IWA OWA	Bldg 3							
11305WRS03A	IWA OWA	Bldg 2							
11305WRS03B	IWA OWA	Bldg 2							
11305WRS03C	IWA OWA	Bldg 2							
	IWA OWA	* Read all samples per Daren 3:40pm 11/03/05 RM							
	IWA OWA								
	IWA OWA								

Relinquished <i>[Signature]</i>	Date 11/3/05	Time 16:00	Received <i>[Signature]</i> Daren Wood	Date 11/03/05	Time 17:26
Relinquished Daren Wood	Date 11/03/05	Time 17:26	Received <i>[Signature]</i> drug off	Date 11/03/05	Time 5:26pm

**EMSL Analytical, Inc.**

499 Rowley Road, Depew, NY 14043

Phone: (716) 551-0030 Fax: (716) 651-0394 Email: huffalolab@emsl.com

**EMSL**

SM

Attn: **Daren Wood**  
**WRS Infrastructure & Environment**  
**221 Hobbs Street**  
**Suite 108**  
**Tampa, FL 33619**

Customer ID: WRSE80  
Customer PO:  
Received: 11/03/05 5:26 PM  
EMSL Order: 140504795

Fax: (908) 876-1086 Phone: (908) 876-1113  
Project: Krauss Warehouse Site, 21 Isabelle Street

EMSL Proj: Krauss Warehouse  
Analysis Date: 11/11/2005  
Report Date: 11/11/2005

**Asbestos Analysis of Bulk Materials by PLM via the NY State ELAP 198.1 Method**

Sample	Location	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
11305wrs01a 140504795-0001	bldg 10	White Fibrous Homogeneous	2.00% Synthetic	98.00% Matrix	None Detected
11305wrs01b 140504795-0002	bldg 10	White Fibrous Homogeneous	5.00% Synthetic	95.00% Matrix	None Detected
11305wrs01c 140504795-0003	bldg 10	White Fibrous Homogeneous	5.00% Synthetic	95.00% Matrix	None Detected
11305wrs02a 140504795-0004	bldg 3	Gray Fibrous Homogeneous		67.00% Matrix	33.00% Chrysotile
11305wrs02b 140504795-0005	bldg 3	Gray Fibrous Homogeneous		78.00% Matrix	22.00% Chrysotile
11305wrs02c 140504795-0006	bldg 3	Gray Fibrous Homogeneous		60.00% Matrix	40.00% Chrysotile
11305wrs03a 140504795-0007	bldg 2	Gray Fibrous Homogeneous	5.00% Cellulose	38.00% Matrix	57.00% Chrysotile
11305wrs03b 140504795-0008	bldg 2	Gray Fibrous Homogeneous	5.00% Cellulose	15.00% Matrix	80.00% Chrysotile
11305wrs03c 140504795-0009	bldg 2	Gray Fibrous Homogeneous	10.00% Cellulose	33.00% Matrix	57.00% Chrysotile

Analyst(s)

Rhonda McGee (9)

  
Kenneth Najuch  
or other approved signatory

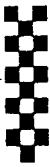
PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Negative PLM results cannot be guaranteed. Samples reported as <1% or none detected should be tested with TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government.

Analysis performed by EMSL Buffalo (NVLAP #200055-0) NY ELAP #11606

PLMPointCount=1

**THIS IS THE LAST PAGE OF THE REPORT.**

## Appendix - C

**NEW YORK STATE DEPARTMENT OF HEALTH  
WADSWORTH CENTER***Antonia C. Novello, M.D., M.P.H., Dr.P.H.*

Expires 12:01 AM April 01, 2006  
Issued April 01, 2005  
Revised October 24, 2005

**CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE***Issued in accordance with and pursuant to section 502 Public Health Law of New York State*

**MR. KENNETH NAJUCH**  
**EMSL ANALYTICAL INC - BUFFALO**  
**490 ROWLEY ROAD**  
**DEPEW, NY 14043**

**NY Lab Id No: 11606**  
**EPA Lab Code: NY01278**

*is hereby APPROVED as an Environmental Laboratory for the category*  
**ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE**  
*All approved subcategories and/or analytes are listed below:*

**Miscellaneous**

Asbestos in Friable Material	EPA 600/M4/82/020
Asbestos in Non-Friable Material-PLM	Item 198.6 of Manual (NOB by PLM)
Asbestos in Non-Friable Material-TEM	ITEM 198.4 OF MANUAL

**Serial No.: 27601**

Property of the New York State Department of Health. Valid only at the address shown. Must be conspicuously posted. Valid certificates have a raised seal. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (516) 485-5570 to verify laboratory's accreditation status.

NEW YORK STATE DEPARTMENT OF HEALTH  
WADSWORTH CENTER

Antonia C. Novello, M.D., M.P.H., Dr.P.H.



Expires 12:01 AM April 01, 2005  
Issued April 01, 2005

**CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE**

*Issued in accordance with and pursuant to section 502 Public Health Law of New York State*

**MR. KENNETH NAJUCH**  
**EMSL ANALYTICAL INC - BUFFALO**  
**490 ROWLEY ROAD**  
**DEPEW, NY 14043 UNITED STATES**

**NY Lab Id No: 11606**  
**EPA Lab Code: NY01278**

*is hereby APPROVED as an Environmental Laboratory for the category*  
**ENVIRONMENTAL ANALYSES POTABLE WATER**  
*All approved subcategories and/or analytes are listed below:*

**Drinking Water Miscellaneous**

**Asbestos**

**EPA 100.1**

**EPA 100.2**

**Serial No.: 26200**

Property of the New York State Department of Health. Valid only at the address shown. Must be consecutively posted. Valid certificates have a raised seal. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (516) 485-5570 to verify laboratory's accreditation status.

NEW YORK STATE DEPARTMENT OF HEALTH  
WADSWORTH CENTER

Antonia C. Novello, M.D., M.P.H., Dr.P.H.

Expires 12:01 AM April 01, 2006  
Issued April 01, 2005

## CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. KENNETH NAJUCH  
EMSL ANALYTICAL INC - BUFFALO  
490 ROWLEY ROAD  
DEPEW NY 14043 UNITED STATESNY Lab Id No: 11606  
EPA Lab Code: NY01278

is hereby APPROVED as an Environmental Laboratory for the category  
ENVIRONMENTAL ANALYSES AIR AND EMISSIONS  
All approved subcategories and/or analytes are listed below:

## Miscellaneous Air

Asbestos

40 CFR APX A No. III

YAMATE, AGARWAL GIBB

Fibers

40 CFR 763.121 APX B

NIOSH 7400 A RULES

Serial No.: 26202

Property of the New York State Department of Health. Valid only at the address shown. Must be conspicuously posted. Valid certificates have a raised seal. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (518) 485-5570 to verify laboratory's accreditation status.

United States Department of Commerce  
National Institute of Standards and Technology



ISO/IEC 17025:1999  
ISO 9002:1994

Certificate of Accreditation



**EMSL ANALYTICAL, INC.**  
DEPEW, NY

*is recognized by the National Voluntary Laboratory Accreditation Program  
for satisfactory compliance with criteria set forth in NIST Handbook 150:2001,  
all requirements of ISO/IEC 17025:1999, and relevant requirements of ISO 9002:1994.  
Accreditation is awarded for specific services, listed on the Scope of Accreditation, for:*

**AIRBORNE ASBESTOS FIBER ANALYSIS**

June 30, 2006

Effective through

A handwritten signature, likely of John P. Waples, is written over a horizontal line.

For the National Institute of Standards and Technology

NVLAP Lab Code: 200056-0

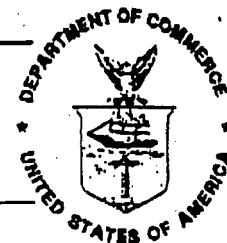
National Institute  
of Standards and Technology



National Voluntary  
Laboratory Accreditation Program

ISO/IEC 17025:1999  
ISO 9002:1994

## Scope of Accreditation



Page: 1 of 1

**AIRBORNE ASBESTOS FIBER ANALYSIS**

**NVLAP LAB CODE 200056-0**

**EMSL ANALYTICAL, INC.**

490 Rowley Road

Depew, NY 14043

Mr. Kenneth J. Najuch

Phone: 716-651-0030 Fax: 716-651-0394

E-Mail: [knajuch@emsl.com](mailto:knajuch@emsl.com)

URL: <http://www.emsl.com/>

**NVLAP Code**

**Designation**

18/A02

U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in 40 CFR, Part 763, Subpart E, Appendix A.

June 30, 2006

Effective through

A handwritten signature in black ink, appearing to read "Kenneth J. Najuch".

For the National Institute of Standards and Technology

United States Department of Commerce  
National Institute of Standards and Technology



ISO/IEC 17025:1999  
ISO 9002:1994

Certificate of Accreditation



EMSL ANALYTICAL, INC.  
DEPEW, NY

*is recognized by the National Voluntary Laboratory Accreditation Program  
for satisfactory compliance with criteria set forth in NIST Handbook 150:2001,  
all requirements of ISO/IEC 17025:1999, and relevant requirements of ISO 9002:1994.  
Accreditation is awarded for specific services, listed on the Scope of Accreditation, for:*

**BULK ASBESTOS FIBER ANALYSIS**

June 30, 2006

Effective through

A handwritten signature in black ink, appearing to read "J. P. M. J.", positioned above a horizontal line.

For the National Institute of Standards and Technology  
NVLAP Lab Code: 200056-0

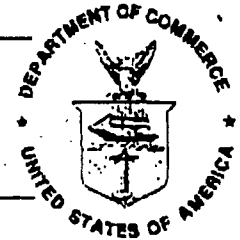
National Institute  
of Standards and Technology



National Voluntary  
Laboratory Accreditation Program

ISO/IEC 17025:1999  
ISO 9002:1994

## Scope of Accreditation



Page: I of 1

**BULK ASBESTOS FIBER ANALYSIS**

**NVLAP LAB CODE 200056-0**

**EMSL ANALYTICAL, INC.**

490 Rowley Road

Depew, NY 14043

Mr. Kenneth J. Najuch

Phone: 716-651-0030 Fax: 716-651-0394

E-Mail: [knajuch@emsl.com](mailto:knajuch@emsl.com)

URL: <http://www.emsl.com/>

**NVLAP Code**

**Designation**

18/A01

EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

June 30, 2006

Effective through

A handwritten signature in black ink, appearing to read "John R. Walsby".

For the National Institute of Standards and Technology

## **Attachment 3**

### *PCB Ballast and Transformer Sampling*



ENVIRONMENTAL SERVICES, INC.

179 Lake Avenue Rochester, New York 14608 (585) 647 - 2530 FAX (585) 647 - 3311

**PCB Analysis Report for Oils**Client: **WRS infrastructure & Env**

Client Job Site: Kraus Warehouse

Lab Project Number: 05-3882

Client Job Number: N/A

Lab Sample Number: 13316

Field Location: T-1

Date Sampled: 11/10/2005

Field ID Number: N/A

Date Received: 11/11/2005

Sample Type: Oil

Date Analyzed: 11/14/2005

Transformer #1

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 49.8
Aroclor 1221	ND< 49.8
Aroclor 1232	ND< 49.8
Aroclor 1242	ND< 49.8
Aroclor 1248	ND< 49.8
Aroclor 1254	ND< 49.8
Aroclor 1260	221

ELAP Number 10958

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL DOCUMENT IS THE SIGNED HARD COPY.

Comments: ND denotes Non Detect  
mg / Kg = milligram per Kilogram

**PCB Analysis Report for Oils****Client:** WRS Infrastructure & Env

Client Job Site: Kraus Warehouse

Lab Project Number: 05-3882

Client Job Number: N/A

Lab Sample Number: 13317

Field Location: T-2

Date Sampled: 11/10/2005

Field ID Number: N/A

Date Received: 11/11/2005

Sample Type: Oil

Date Analyzed: 11/11/2005

Transformer #2

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 49.6
Aroclor 1221	ND< 49.6
Aroclor 1232	ND< 49.6
Aroclor 1242	ND< 49.6
Aroclor 1248	ND< 49.6
Aroclor 1254	ND< 49.6
Aroclor 1260	225

ELAP Number 10958

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL DOCUMENT IS THE SIGNED HARD COPY.

Comments: ND denotes Non Detect  
mg / Kg = milligram per Kilogram

**PCB Analysis Report for Oils****Client:** WRS Infrastructure & Env

Client Job Site: Kraus Warehouse

Lab Project Number: 05-3882

Client Job Number: N/A

Lab Sample Number: 13318

Field Location: T-3

Date Sampled: 11/10/2005

Field ID Number: N/A

Date Received: 11/11/2005

Sample Type: Oil

Date Analyzed: 11/11/2005

Transformer #3

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 48.7
Aroclor 1221	ND< 48.7
Aroclor 1232	ND< 48.7
Aroclor 1242	ND< 48.7
Aroclor 1248	ND< 48.7
Aroclor 1254	ND< 48.7
Aroclor 1260	270

ELAP Number 10958

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL DOCUMENT IS THE SIGNED HARD COPY.

Comments: ND denotes Non Detect  
mg / Kg = milligram per Kilogram

**PCB Analysis Report for Soils/Solids/Sludges****Client:** WRS Infrastructure & Env

Client Job Site: Kraus Warehouse

Lab Project Number: 05-3882

Client Job Number: N/A

Lab Sample Number: 13319

Field Location: B-1

Date Sampled: 11/10/2005

Field ID Number: N/A

Date Received: 11/11/2005

Sample Type: Solid

Date Analyzed: 11/11/2005

Light Ballast #1

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 47.6
Aroclor 1221	ND< 47.6
Aroclor 1232	ND< 47.6
Aroclor 1242	ND< 47.6
Aroclor 1248	ND< 47.6
Aroclor 1254	ND< 47.6
Aroclor 1260	134

ELAP Number 10958

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL DOCUMENT IS THE SIGNED HARD COPY.

Comments: ND denotes Non Detect  
mg / Kg = milligram per Kilogram

**PCB Analysis Report for Soils/Solids/Sludges****Client:** WRS Infrastructure & Env

Client Job Site: Kraus Warehouse

Lab Project Number: 05-3882

Client Job Number: N/A

Lab Sample Number: 13320

Field Location: B-2

Date Sampled: 11/10/2005

Field ID Number: N/A

Date Received: 11/11/2005

Sample Type: Solid

Date Analyzed: 11/11/2005

*Light Ballast #2*

PCB Identification	Results in mg / Kg
Aroclor 1016	ND< 4.95
Aroclor 1221	ND< 4.95
Aroclor 1232	ND< 4.95
Aroclor 1242	ND< 4.95
Aroclor 1248	ND< 4.95
Aroclor 1254	ND< 4.95
Aroclor 1260	38.9

ELAP Number 10958

Method: EPA 8082

ELECTRONIC REPORT FACSIMILE. THE ORIGINAL DOCUMENT IS THE SIGNED HARD COPY.

Comments: ND denotes Non Detect  
mg / Kg = milligram per Kilogram

# **Attachment 4**

## *Site Inventory*

## Drums/Boxes generated on site

Material	Qty	Size	Type	G/L/S	Drum/Box Numbers
<b>Drums</b>					
Aerosols	4	55 G	DM	G	1, 2, 3, 25
Lime	1	55 G	DM	S	4
Waste Oil	4	55 G	DM	L	5, 6, 9, 24
Oil Solids, Speedy Dry, Oil Filters	2	55 G	DM	S	7, 21
Anit-Freeze	2	55 G	DM	L	8, 22
Antiquing Release (Have MSDS)	1	55 G	DM	S	10
Sand Blasting Grit	1	55 G	DM	S	11
Gasoline	1	55 G	DM	L	12
Grease	4	55 G	DM	S	13, 14, 15, 23
Hydrochloric Acid	1	55 G	DF	L	16
Flammable Liquid Consolidation	1	55 G	DM	L	17
Hydrogen Peroxide 50%	3	30 G	DF	L	18, 19, 20

Sub Total 25

## Cubic Yard Boxes

Paint	9	Cu. Yd. Box	Fibre	L	B1,B2,B3,B4,B5,B6,B9,B9,B10
Driveway Sealer	2	Cu. Yd. Box	Fibre	L	B7,B8
Non-Regulated Solids	1	Cu. Yd. Box	Fibre	S	B12

Sub Total 12

## Lab Packs

Corrosive Liquid, Base, Inorganic	4	55 G	DM	L	LP 1, 2, 3, 59
Corrosive Liquid, Acid, Inorganic	2	55 G	DM	L	LP 4, 5
Corrosive Liquid, Acid, Inorganic	1	30 G	DF	L	LP 60
Non-Regulated Liquid Waste	9	55 G	DM	L	LP 6, 7, 8, 16, 17, 31, 32, 45, 46
Waste Paint	15	55 G	DM	L	LP 9, 10, 11, 12, 13, 14, 30, 35, 36, 38, 39, 40, 41, 42, 43
Flammable Liquid	9	55 G	DM	L	LP 15, 18, 19, 20, 21, 22, 33, 37, 44
Pesticides, Liquids, Flammable, Toxic	2	55 G	DM	L	LP 23, 24
Non-Regulated Solid Waste	2	55 G	DM	S	LP 25, 26
Toxic Liquids, Flammable, Organic	1	55 G	DM	L	LP 27

Drums/Boxes generated on site

Latex Paint	2	55 G	DM	L	LP 28, 29
Amines	1	55 G	DM	L	LP 34
Organic Peroxides, Liquid	2	5 G	DF	L	LP 47, 48
Isocyanates, Flammable, Toxic	1	5 G	DF	L	LP 49
Mercury Compounds	1	5 G	DF	L	LP 50
Hazardous Waste Solid	1	5 G	DF	S	LP 51
Mercury, Metallic	1	5 G	DF	L	LP 52
Corrosive Solid, Organic	1	5 G	DF	S	LP 53
Aluminum Chloride Solution	1	5 G	DF	L	LP 54
Ferric Chloride Solution	1	5 G	DF	L	LP 55
Napthalene	1	5 G	DF	L	LP 56
Hypochlorite, Inorganic	1	5 G	DF	S	LP 57
Hypochlorite, Solution	1	5 G	DF	L	LP 58
Fireworks	1	5 G	DF	S	LP 61

Sub Total 61

Collected Drums/ Contents 71

Total Drums to Date 169

Updated: 11/9/05

This does not include: Fluorescent bulbs, Ballasts, Propane tanks, or Freon/Freon containing items

Date	Oil	Aerosols	Batteries	Adhesives/paint thinner	Cleaning Products	Antifreeze	Pesticides/plant food	Unknown	Known flammables	Paints	Ammonias	Acids	Organics	Refridge /freon	Fire Extinguishers	Asb. Bags	55 Gallon drums	Empty 55 Gal Drums	Propane	PCB ballasts From Lights	50% Hydrogen Peroxide	Daily Total	Running Total
up till 9/21/05	84	85	10	80	72	9	12	180	23	238	2	1	1	0	0	2	0	0	55	0	0	854	854
9/21/2005	14	45	0	36	0	0	2	15	3	33	0	0	0	0	0	0	0	0	0	0	0	147	1001
9/22/2005	29	26	0	22	6	3	0	23	14	48	0	0	0	0	4	0	0	0	0	0	0	175	1176
9/23/2005	2	16	2	25	6	0	0	30	10	38	0	1	0	2	2	0	0	0	0	0	0	134	1310
9/26/2005	2	22	0	1	3	1	0	5	1	7	0	0	0	0	1	0	0	0	0	0	0	43	1353
9/27/2005	15	16	4	14	17	0	0	15	0	8	0	1	0	10	2	0	0	0	0	0	0	104	1457
9/28/2005	12	47	4	16	3	7	0	18	16	44	1	1	0	0	3	0	0	0	0	0	0	172	1629
9/29/2005	13	43	8	10	29	1	1	13	1	59	0	0	0	0	0	0	0	0	0	0	0	181	1810
9/30/2005	11	28	4	28	20	4	1	27	7	35	0	0	0	1	1	0	0	0	0	0	0	167	1977
10/3/2005	0	0	0	0	0	0	27	16	0	10	0	0	0	1	1	0	0	0	0	0	0	55	2032
10/4/2005	51	37	2	48	12	7	8	66	4	68	0	0	0	5	0	0	0	0	0	0	0	308	2340
10/5/2005	17	23	2	23	31	31	2	28	15	29	0	1	10	1	0	0	0	0	0	0	0	203	2543
10/6/2005	16	16	1	24	9	0	0	28	0	51	0	0	0	0	1	0	0	0	0	0	0	146	2689
10/7/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2689
10/10/2005	34	25	1	4	74	5	2	10	28	19	2	1	0	1	0	0	0	0	0	0	0	206	2895
10/11/2005	15	10	4	18	11	2	0	24	10	10	0	0	3	1	1	0	0	0	0	0	0	105	3004
10/12/2005	16	64	1	40	21	0	5	8	37	72	1	2	29	1	0	0	0	0	0	0	0	297	3301
10/13/2005	0	4	15	2	0	1	0	0	0	20	0	0	3	0	0	0	0	0	0	0	0	45	3346
10/14/2005	0	15	6	3	4	0	1	8	3	28	0	1	34	2	1	0	0	0	0	0	0	106	3452
10/17/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3452
10/18/2005	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	3454
10/19/2005	1	1	0	0	0	1	0	0	0	50	0	0	26	8	0	0	0	0	0	0	0	79	3533
10/20/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3533
10/21/2005	0	0	0	0	0	0	0	0	0	7	0	0	4	0	0	0	0	0	0	0	3	14	3547
10/24-11/1/2005										0												0	3547
11/2/2005	49	126	8	12	28	5	11	17	86	64	0	2	379	4	1	0	0	0	5	0	0	799	4346
11/3/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27	49	0	0	0	76	4422
11/4/2005	49	9	0	0	1	1	0	0	3	0	0	0	8	0	0	0	28	26	0	0	0	125	4547
11/7/2005	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	3	35	7	0	0	48	4595
11/8/2005	4	2	0	5	1	0	0	0	6	11	0	1	3	0	1	0	2	68	0	0	0	104	4699
11/9/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0	0	0	0	3	4702
11/10/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4702
11/11/2005	12	32	8	0	6	2	0	12	2	92	0	0	29	0	2	0	0	0	4	0	0	201	4903
11/14/2005	6	6	3	1	0	0	1	0	4	0	0	0	1	0	0	0	4	6	0	0	0	32	4935
11/15/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4935
11/16/2005	3	7	0	0	0	1	0	0	5	0	0	0	4	0	0	0	4	5	0	0	0	29	4964
11/17/2005	2	1	0	0	0	0	0	0	0	1	0	0	5	0	0	0	0	1	0	0	0	10	4974
11/21/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4974
11/22/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4	14	0	0	0	18	4992
12/1/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	491	0	491	5483
12/2/2005	2	12	10	1	0	0	1	0	2	1	12	0	8	1	1	0	0	0	0	99	0	150	5633
12/5/2005	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	75	0	75	5708
																					0	0	5708
Totals	457	709	83	411	354	81	73	543	275	1051	8	12	530	29	23	2	75	204	71	665	3	5708	5633

Updated through 12/1/2005

Estimated Empty Count >3900

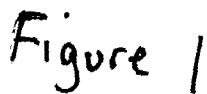
Note: Except for 55 gallon drums, empties are not included in the above totals.

## **Attachment 5**

*Figure 1 - Site Location*

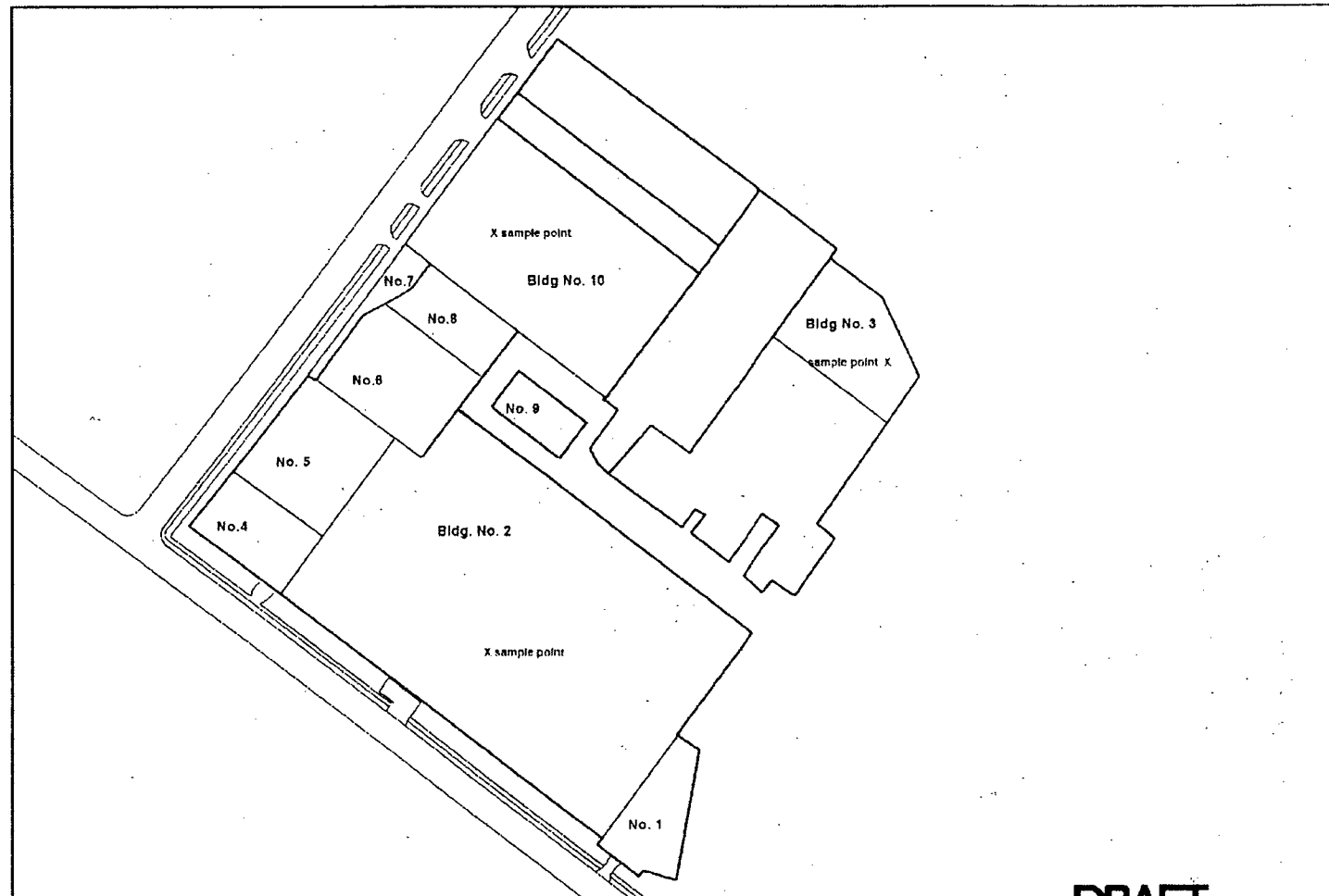
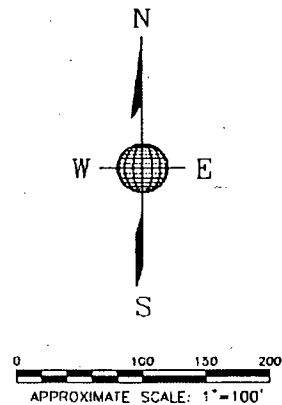
*Figure 2 - Site Layout*

*Figure 3 - Site Aerial Photo*





Kraus Warehouse Site  
Figure 3  
Site Aerial Photograph



**DRAFT**

DRAWING STATUS		<input type="checkbox"/> DRAFT	<input checked="" type="checkbox"/> FINAL
PROJECT NO. : 525622			
PROJECT MANAGER: SCOTT SODCN			
SCALE: 1"=100'			
REVISION NO.: 0	REV DATE:		
CADD ID: 5250224001	PLOT DATE: 05/14/05		
DRN CY: O.K.M.	DRN DATE: 05/14/05		
CHK BY: S.S.	CHK DATE: 05/14/05		
APPVD BY: S.S.	APPVD DATE: 05/14/05		



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**FIGURE 2**  
**SITE MAP**  
**KRAUS WAREHOUSE**  
**ADDRESS**